

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
CENTRAL DIVISION**

UNITED STATES OF AMERICA	)	
	)	No. 15-CR-315
v.	)	
	)	Judge Thomas M. Durkin
JOHN DENNIS HASTERT	)	

**JOINT MOTION FOR AN EXTENSION OF TIME FOR  
DEFENDANT TO FILE PRETRIAL MOTIONS**

The United States of America and Defendant John Dennis Hastert, by and through their respective counsel, hereby move this Honorable Court for a two-week extension of time for Defendant to file pretrial motions. In support thereof, the parties state as follows:

1. During a status hearing on July 14, 2015, this Honorable Court set a briefing schedule requiring that Defendant file his pretrial motions on or before August 31, 2015.
2. Thereafter, on August 24, 2015, this Honorable Court granted Defendant's unopposed request for an extension of time to file pretrial motions.
3. Pursuant to the briefing schedule entered by the Court on August 24, 2015, Defendant's pretrial motions are to be filed by September 14, 2015, the Government's response is currently due on October 5, 2015, and Defendant's reply is due on October 16, 2015.
4. The Government and Defendant have been engaged in discussions regarding certain issues that Defendant may raise in his pretrial motions. This extension, if granted, will allow the parties time to address these issues and may therefore obviate the need for Defendant to raise, and the Court to address, these issues.

5. For the foregoing reasons, the Government and Defendant respectfully request that this Court extend the time for Defendant to file pretrial motions to September 28, 2015. In addition, the parties request that the status hearing currently set for October 20, 2015 be stricken and reset for November 16, 2015, or as soon thereafter as this Honorable Court prefers.

WHEREFORE, the United States of America and Defendant John Dennis Hastert respectfully request that this Honorable Court GRANT the parties' Joint Motion for an Extension of Time for Defendant to File Pretrial Motions, and extend the schedule as follows:

1. Defendant's pretrial motions are to be filed by September 28, 2015.
2. The Government's response is due by October 19, 2015.
3. Defendant's reply is due by November 2, 2015.
4. Status hearing is stricken and reset for November 16, 2015, or as soon thereafter as this Honorable Court prefers.

September 10, 2015

Respectfully submitted,

By: /s/ Thomas C. Green

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Respectfully submitted,

By: /s/ Steven A. Block

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**CERTIFICATE OF SERVICE**

I, Geeta Malhotra, hereby certify that on September 10, 2015, I caused a copy of the foregoing to be electronically filed with the Clerk of the United States District Court for the Northern District of Illinois, using the CM/ECF system, which will send notification of such filing to all attorneys of record.

/s/ Geeta Malhotra